

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
GALVESTON DIVISION**

LESLIE McCOLGIN, on Behalf of Himself
and Others Similarly Situated,

v.

ALLTECH SYSTEMS, INC.,

CASE NO. 3:15-cv-193

COLLECTIVE ACTION

**JOINT MOTION TO FILE
SETTLEMENT AGREEMENT UNDER SEAL**

Plaintiff Leslie McColgin, on behalf of himself and others similarly situated (collectively, “Plaintiffs”), and Defendant AllTech Systems, Inc. (AllTech) (Plaintiffs and AllTech are referred to collectively as the “Parties”), move to file the Settlement Agreements under seal.

In support of this motion, the Parties state the following:

1. Plaintiff alleges AllTech failed to pay overtime as required by federal law.
2. The Parties engaged in extensive settlement negotiations, which were successful in reaching a settlement.
3. The terms of the settlement, covering the workers, are memorialized in a written Settlement Agreement.
4. The Parties will request the Court approve the terms of the Settlement Agreement.
5. Each Settlement Agreement identifies all persons who are eligible for payments under the Settlement Agreement, the amount of each person’s payment under the Settlement

Agreement (subject to certain conditions set forth in the Settlement Agreement being satisfied) and the amount to be paid for reasonable attorneys' fees.

6. This Court recognizes the need to protect privacy interests of parties and witnesses in this era of electronic case file access. *See, e.g.*, General Order No. 2004-11. Plaintiffs' identities and the amount they are receiving are obviously private information. The Parties believe that to protect the privacy interests of the persons eligible to receive payments under the Settlement Agreements, including the amounts, the Settlement Agreements should be submitted to the Court under seal for *in camera* review and approval.

7. Any individuals who are eligible to participate will have the right and opportunity to review the entire Settlement Agreement covering their claim if they choose to do so. Thus, every potential plaintiff will be able to fully evaluate the fairness and reasonableness of the applicable Settlement Agreement before deciding whether to participate in the settlement.

Respectfully submitted,

BRUCKNER BURCH PLLC

/s/ Rex Burch

By: _____

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COUNSEL FOR DEFENDANT

CERTIFICATE OF CONFERENCE

This is a joint motion.

/s/ Rex Burch

Richard J. (Rex) Burch

CERTIFICATE OF SERVICE

On the date stamped above, I served this document on all counsel of record by ECF.

/s/ Rex Burch

Richard J. (Rex) Burch